ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: October 17, 1985

TO: Enforcement Decision Group - R. Kuykendall, G. King, G. Savage

FROM: David S. Retzlaff and Robert A. Wengrow

SUBJECT: 2010300031-Winnebago County
Rockford/Rexnord-Rockford Products, Plant 3
ILD005212097

This site is located at 707 Harrison Avenue, Rockford, Illinois, 61101. They have a seepage pit permitted by DWPC (1984-EO-0221) to receive "storm water runoff from building roofs, parking lots, adjacent residual property and non-contact cooling water (approximately 36,000 gpd) from the metal finishing operations". There are no surface discharges from this seepage pit.

In addition, the company also has an IEPA Air Operating Permit (81040047) to emit 20 tons of 1,1,1-trichloroethane/year via four vapor degreasers.

On November 2, 1984 Robert Wengrow and David Retzlaff visited this site to discuss the history of the seepage pit with Rockford Products personnel. On this date Mr. Larry Hammond, Manager of Plant Facilities, said that the last pipe discharging waste oil into the pit was disconnected on July or August of 1984. (He later said that it was disconnected in January of 1984). Upon viewing the seepage pit, we could see that the banks were coated with oil.

On November 28, 1984 Dave Retzlaff returned to the site to sample the seepage pit and incoming stream. Dave was accompanied by Chris Berndt of Rockford Products. Five samples were collected. Three water samples were collected for Volatile Organics (S101,S102, S501); One bottom sediment sample was collected for E.P. Toxicity metals (X302) and one bottom sediment sample was collected for purgeable and extractable organics (X301). (All results except X301 are attached).

Sample S1C1 yielded 213 ppb total volatile organic compounds. This number includes 66 ppb 1,1,1-trichloroethane, 66 ppb trichloroethylene and 6 ppb tetrachloroethylene, all F002 wastes. Sample S102 yielded 87 ppb total volatile organics, including 36 ppb 1,1,1-trichloroethane, 29 ppb trichloroethylene and 3 ppb tetrachloroethylene. Sample S501 yielded 29 ppb 1,1,1-trichloroethane, 25 ppb trichloroethylene and 2 ppb tetrachloroethylene. Sample X301 did not yield any organics (verbal). Sample X302 did not exceed the standards for any E.P. Toxic metals.

Note that a sample taken from the southeast corner of the seepage pit by Charles Corley of DWPC on November 16, 1983 yielded 30 ppb total volatile organics. This number includes 11 ppb 1,1,1-trichloroethane, 11 ppb trichloroethylene and 1 ppb tetrachloroethylene.

On April 23, 1985 Dave Retzlaff returned to Rockford Products-Plant 3 to discuss the results of the samples taken in November of 1984 and as a result of the analyses, to perform a Subpart F inspection. Dave Retzlaff explained to Larry Hammond and Steve Reid (Plant Manager) that the Agency was considering the seepage pit a hazardous waste disposal lagoon due to the presence of the listed wastes and that it was therefore subject to RCRA groundwater monitoring requirements.

A C.I.L. (dated May 2, 1985) was sent to Rockford Products-Plant 3 citing Subpart F violations and 703.154 for activities not specified in the Part A Permit application. The Agency received a response dated May 22, 1985 stating that, in their opinion, the seepage pit is not RCRA regulated.

A P.E.C.L. was sent June 13, 1985 citing the same sections as the 5/2/85 C.I.L. with the addition of financial violations. A Pre-Enforcement Conference was held on June 27, 1985 in Rockford. In attendance were Mr. Larry Hammond, Mr. Aaron Handt (Environmental Counsel-Rexnord); Robert Wengrow and David Retzlaff, IEPA. At this meeting Rockford Products provided some chemical analyses of groundwater (via three monitor wells per DWPC permit) and pit bottom sediment. The bottom sediment sample showed no detectable organics. Wells W1 and W2 showed 1,1,1-trichloroethane and trichloroethylene. Well W3 showed these two compounds plus 1,1-dichloroethane. These results, plus 3 quarters worth of groundwater results (per DWPC permit) seem to indicate groundwater degradation on site. At the conclusion of this meeting, Rockford Produts again denied that they were RCRA regulated but agreed to look into the source of the solvents.

A second meeting was held with Rockford Products-Plant 3 on September 23, 1985. In attendance were Larry Hammond, Phil Carnock and Aaron Hardt of the Rockford Products. Representing IEPA were Robert Wengrow and David Retzlaff. Mr. Hardt again stated that the seepage pit was not RCRA regulated because 1) The 1,1,1-trichloroethane did not enter the pond as a waste activity. 2) The 1,1,1-trichloroethane enters the pond via condensation from the vapor degreaser.

Rockford Products Air Operating Permit allows Plant 3 to emit 1,1,1-trichloroethane in a gaseous state. Mr Hardt states that although some of the solvent condenses and runs off of the roof and into the pond, it is not RCRA regulated because (with the concurrence of RCRA Hotline) RCRA does not regulate non-containerized gases. Mr Hardt further states that since the 1,1,1-trichloroethane is a condensed gas and not the result of a stored or disposed waste, the pit is not RCRA regulated.

Rockford Products did not address the presence of trichloroethylene (used as a degreaser on site prior to 1980). This compound occurs in almost equal amounts as 1,1,1-trichloroethane in every sample where volatile compounds are detected.

Note that while Rockford Products-Plant 3 has an air permit to emit up to 20 tons of 1,1,1-trichloroethane per year, the facility received a C.I.L. from DWPC dated November 16, 1984 stating that the facility was emitting over 200 tons of 1,1,1-trichloroethane per year. This level which is 10 times the permitted amount, was acknowledged by the facility as being true. The facility has not corrected this apparent violation, to date.

The DWPC permit #1984-EO-0221 issued to this facility required that one upgradient and two downgradient groundwater monitoring wells had to be installed as a permit condition. While three wells were indeed installed, based on elevatons of groundwater surface elevations provided by Rockford Products, this permit condition has not been met. While the seepage pit may be permitted to receive storm water runoff and non-contact cooling water, it appears that the nature of the seepage pit provides a direct conduit for the solvents to enter the groundwater. While the samples of the bottom sediments have not shown any solvents it should be noted that the detection limits for volatile organics in the sediments are approximately 10 times greater (less sensitive) than the detection limits of the same compounds in water.

We conclude that if this seepage pit is not RCRA regualted (and we feel it is) then any enforcement actions should proceed through DWPC or DAPC for permit violations. On the other hand if it is the opinion of the EDG that, regardless of the contaminant source, this pond is RCRA regulated we are requesting that an ENL be sent to Rockford Products-Plant 3 informing them of the necessity to comply with Subpart F and all other pertinent parts of Title 35 Subtitle G Chapter I.

RAN/DSR/blp
cc: Rockford Region
Steve Strauss
Attachments

Site ID Number ILD 005 212 097

NOTES, OTHER OBSERVATIONS AND RECOMMENDATIONS

Mr. Hammond said the facility is now in the process of closing the land based TSD units. It still generates hazardous waste; however, this waste is now stored for less then 90 days and is transported off-site to a certified RCRA facility.

The site does have what Mr. Hammond calls a "seepage pit". The facility stated that IEPA considers this pit a hazardous waste surface impoundment because it contains 5 to 66 ppb 1,1,1 trichloroethane. According to Mr. Hammond, the facility is undertaking with the IEPA a study on monitoring the surface water and sampling wells associated with the seepage pit. At the time of the inspection, Mr. Hammond was unable to report the 1,1,1 trichloroethane contamination source in the seepage pit, however, the site does generate waste 1,1,1 trichloroethane. Mr. Hammond suspects the TCE might come from an underground source that is not related to its operation.

The site also includes a landfill that was used for the disposal of wheelabrator grit, baghouse dust, used soluable oil, and machinery parts from the plant operation. Mr. Hammond considers this landfill non-hazardous.

PRC recommends that a revised Part A application be submitted by the facility which reflects the change in facility ownership, addition of the seepage pit, and the deletion of the incinerator.

Mr. Hammond stated that the facility has no intention of submitting a Part B permit application, but it is in the process of closing out the container storage areas, incinerators, seepage pit and the landfill. A closure plan was submitted

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NOTES, OTHER OBSERVATIONS AND RECOMMENDATIONS
(Continued)

to U.S. EPA on September 30, 1985 and includes only the container storage area and the inactive incinerator. This plan was found to be inadequate by IEPA, and a revised plan will need to be submitted.